

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

IN RE:	)	Chapter 11
	)	
KAISER GROUP INTERNATIONAL,	)	Case No. 00-2263 (MFW)
INC., <i>et al.</i> ,	)	
	)	(Jointly Administered)
Debtors.	)	
<hr/>		
KAISER GROUP INTERNATIONAL,	)	
INC., <i>et al.</i> ,	)	
	)	
Appellants,	)	
	)	
v.	)	Civil Action No. 04-278-JJF
	)	
JAMES D. PIPPIN and the CLASS OF ICT	)	
SPECTRUM BANKRUPTCY CLAIMANTS,	)	
	)	
Appellees.	)	Related to Docket No. 14

**APPELLANT'S STATEMENT OF THE ISSUES ON APPEAL  
AND DESIGNATION OF ITEMS TO BE INCLUDED IN THE RECORD**

Pursuant to Rule 6(b) of the Federal Rules of Appellate Procedure, Appellant, Kaiser Group International, Inc. (“Kaiser”), provides a statement of the issues to be presented in its appeal from the Memorandum Opinion (Docket No.12) and Final Order (Docket No. 13) of the Honorable Joseph J. Farnan of the United States District Court for the District of Delaware dated June 24, 2005 affirming the Order of the Honorable Mary F. Walrath, United States Bankruptcy Court for the District of Delaware, dated February 2, 2004 (Docket No. 1617) on the Motion of Claimant James D. Pippin and the Class of ICT Spectrum Bankruptcy Claimants for Resolution of the Class Claim. For the avoidance of doubt, Kaiser does not raise any issue on appeal with respect to that portion of the Order of the Honorable Mary F. Walrath, United States Bankruptcy Court for the District of Delaware, dated February 2, 2004 (Docket No. 1617) allowing the

distribution of 15,625 shares of New Common stock on account on the Class 5 equity interests held by the Pippin claimants and this portion of such Order, and the Order of the United States District Court for the District of Delaware dated June 24, 2005 affirming such portion of such Order, is final and unappealable.

In further accordance with Fed. R. App. P. 6(b), Kaiser designates the items to be included in the record on appeal.

**I. STATEMENT OF THE ISSUES ON APPEAL**

1. Whether the bankruptcy court erred in granting the Motion of Claimant James D. Pippin and the Class of ICT Spectrum Bankruptcy Claimants ("Pippin") for Resolution of the Class Claim and ordering Kaiser to issue 247,350 additional shares of New Common stock to Pippin notwithstanding the confirmation and substantial consummation of the Plan, Pippin's failure to seek or obtain a stay and the res judicata effect of the Findings of Fact, Conclusions of Law, Order and Judgment Confirming the Debtors' Second Amended Plan of Reorganization dated December 5, 2000 (Docket No. 801)?

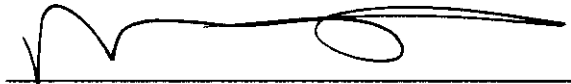
**II. DESIGNATION OF ITEMS TO BE INCLUDED IN THE RECORD**

<b>Bankruptcy Court Docket No.</b>	<b>Filing Date</b>	<b>Description</b>
463 Original NIBS 459	09/27/2000	Objection To Amended Plan of Reorganization
801 Original NIBS 792	12/05/2000	Findings of Fact , Conclusions of Law, Order and Judgment Confirming the Debtors' Second Amended Plan of Reorganization
1091 Original NIBS 1081	04/11/2001	Opinion and Order
1578	10/10/2003	Motion for Distribution of New Common Stock
1579	10/28/2003	Debtors' Objection to Motion by James D. Pippin and The Class of ICT Spectrum Claimants for Distribution of New Common Stock
1588	11/20/2003	Motion of Claimant James D. Pippin and The Class of ICT Spectrum Claims for Resolution of the Class Claim
1590	11/26/2003	Objection of Anita L. Blaney to Motion for Resolution of Class Claim filed by Claimant James D. Pippin
1602	12/12/2003	Debtors' Response to Motion by James D. Pippin and The Class of ICT Spectrum Claimants for Resolution of the Class Claim
1604	12/22/2003	Notice of Motion (Motion for Resolution of the Class Claim)
1612	01/29/2004	Proposed Order regarding Resolution of Pippin Class Proof of Claim
1614	02/02/2004	Certification of Counsel Regarding Proposed Order on Motion of Claimant James D. Pippin and The Class of ICT Spectrum Claimants for Resolution of the Class Claim
1617	02/02/2004	Order
1620	02/12/2004	Kaiser Group International, Inc.'s Motion for Reconsideration
1621	02/12/2004	Kaiser Group International, Inc.'s Memorandum in Support of Motion for Reconsideration

1624	02/13/2004	Transcript of Agenda Hearing Held on January 20, 2004
1637	03/15/2004	Memorandum of Claimant James D. Pippin and The Class of ICT Spectrum Claimants In Opposition to Debtors' Motion for Reconsideration
1641	03/24/2004	Order Denying Motion For Reconsideration of the Bankruptcy Court's February 2, 2004 Order
1642	03/29/2004	Notice of Appeal
1650	04/15/2004	Transcript of Agenda Hearing held 3/24/2004
<b>District Court Docket No.</b>	<b>Filing Date</b>	<b>Description</b>
1	04/30/2004	Notice of Appeal by Kaiser Group et al of the Order of the Bankruptcy Court entered on 2/2/04 by the Honorable Mary F. Walrath.
2	4/30/2004	Designation, Statement of Issues and Designated Record by Kaiser Group et al of record on appeal
3	04/30/2004	Designation of Record by James D. Pippin, Spectrum Claimants of record on appeal
4	04/30/2004	Notice of docketing bankruptcy record on appeal.
5	05/12/2004	Case assigned to Judge Joseph J. Farnan Jr. Notice to all parties.
6	05/17/2004	Appellant's Brief on Appeal by Kaiser Group et al.
7	05/28/2004	Appellee's Brief on Appeal by James D. Pippin, Spectrum Claimants.
8	06/07/2004	Stipulation with Proposed Order for Extension of Time to File Reply Brief by 06/14/04.
	06/09/2004	So Ordered granting stipulation
9	06/14/2004	Appellant's Reply Brief by Kaiser Group et al. to the Brief of Appellee ICT Spectrum Bankruptcy Claimants.
10	06/15/2004	Certificate of Service by Kaiser Group et al. re Appellant's Reply Brief.

11	06/18/2004	Request by Kaiser Group et al. for Oral Argument
12	06/24/2005	Memorandum Opinion
13	06/24/2005	Final Order affirming the order of the Bankruptcy Court dated February 2, 2004.
14	07/22/2005	Notice of Appeal of Memorandum Opinion and Order to the United States Court of Appeals for the Third Circuit.

Kaiser respectfully reserves the right to supplement or amend the items designated and issues stated herein.



Mark Minuti (No. 2659)  
**SAUL EWING LLP**  
222 Delaware Avenue, Suite 1200  
P.O. Box 1266  
Wilmington, DE 19899  
(302) 421-6840

-and-

Kenneth N. Klee (Cal. Bar No. 63372)  
Daniel J. Bussel (Cal. Bar No. 121939)  
**KLEE TUCHIN BOGDANOFF & STERN LLP**  
2121 Avenue of the Stars  
Suite 3300  
Los Angeles, CA 90067  
(310) 407-4000

Counsel for Kaiser Group International, Inc.

Dated: August 1, 2005

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

IN RE:	)	Chapter 11
	)	
KAISER GROUP INTERNATIONAL,	)	Case No. 00-2263 (MFW)
INC., <i>et al.</i> ,	)	
	)	(Jointly Administered)
Debtors.	)	
	)	
KAISER GROUP INTERNATIONAL,	)	
INC., <i>et al.</i> ,	)	
	)	
Appellants,	)	
	)	
v.	)	Civil Action No. 04-278-JJF
	)	
JAMES D. PIPPIN and the CLASS OF ICT	)	
SPECTRUM BANKRUPTCY CLAIMANTS,	)	
	)	
Appellees.	)	

**CERTIFICATE OF SERVICE**

I, Mark Minuti, Esquire, hereby certify that on August 1, 2005, I caused a copy of the **Appellant's Statement Of The Issues On Appeal And Designation Of Items To Be Included In The Record** to be served on the following parties in the manner indicated.

Pamela S. Tikellis, Esquire  
Robert J. Kriner, Jr., Esquire  
Chimicles & Tikellis LLP  
One Rodney Square  
P. O. Box 1035  
Wilmington, DE 19899  
**(By Hand)**

J. Dennis Faucher, Esquire  
William Kane, Esquire  
Michael S. Tarringer, Esquire  
Miller Faucher and Cafferty LLP  
One Logan Square, Suite 1700  
18<sup>th</sup> & Cherry Streets  
Philadelphia, PA 19103  
**(By Telecopy and U.S. Mail)**



---

Mark Minuti (No. 2659)

**SAUL EWING LLP**

222 Delaware Avenue, Suite 1200

P.O. Box 1266

Wilmington, DE 19899

(302) 421-6800